



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

November 11, 2022

Application GRANTED. The Clerk of
Court is directed to terminate ECF No. 11.
SO ORDERED.

BY ECF

Honorable Jesse M. Furman
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Saleh, et al. v. Mayorkas, et al.*,
22 Civ. 5662 (JMF)

November 14, 2022

Dear Judge Furman:

This Office represents the government in the above-referenced action, in which plaintiffs seek an order directing U.S. Citizenship and Immigration Services (“USCIS”) to re-adjudicate, and grant, plaintiffs’ I-130 Petition for Alien Relative. Pursuant to the Court’s Order of September 8, 2022, the government’s response to the complaint is due by Monday, November 14, 2022. *See* ECF No. 9. Also, the parties are to appear for an initial pretrial conference on January 10, 2023, at 3:45 pm. *See* ECF No. 5. I write respectfully, with plaintiffs’ consent, to request a 65-day extension of the time for the government to respond to the complaint, until January 18, 2023.

The parties previously agreed that plaintiffs would submit additional documentation to USCIS in support of the I-130 petition. However, plaintiffs have been delayed in this process. Plaintiffs have stated that they now intend to submit such documentation by December 2, 2022. Within 45 days of receiving that documentation, USCIS plans to complete re-adjudication of the I-130 petition. If the adjudication is resolved in plaintiffs’ favor, the parties will likely be able to resolve this matter without further intervention of the Court.

Accordingly, in the interests of efficiency and conservation of judicial and party resources, and to provide the parties with sufficient time to determine whether the matter can be resolved without further intervention of the Court, I respectfully request a 65-day extension of the government’s deadline to respond to the complaint. If the matter cannot be resolved, then the additional time will provide the government with time to prepare its response to the complaint. The Court previously granted one request for an extension of time. *See* ECF No. 9. As noted, plaintiffs have consented to this request.

Thank you for your consideration of this request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney

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cc: counsel of record (via ECF)